

EXHIBIT G

Father Jeffrey Paveligo
December 08, 2021

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Case No. 1:21-CV-00131-JD

VIDEO-RECORDED DEPOSITION OF: FATHER JEFFREY PAVELIGO
December 8, 2021
(Via RemoteDepo)

VERY REVEREND GEORGES F. DE LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS; ANITA CAREY; ST. MICHAEL'S MEDIA
A/K/A CHURCH MILITANT,

Defendants.

PURSUANT TO SUBPOENA and NOTICE, the video-recorded deposition of FATHER JEFFREY PAVELIGO was taken on behalf of the Michigan Defendants in El Paso County, Colorado, by remote means on December 8, 2021, at 7:34 a.m., before Deborah A. VanDemark, Registered Professional Reporter, Colorado Realtime Certified Reporter, and Notary Public within Colorado, appearing remotely from Jefferson County, Colorado.

Father Jeffrey Paveligo
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<p style="text-align: right;">Page 14</p> <p>1 Q. Did any of them involve his mental</p> <p>2 health issues?</p> <p>3 A. No.</p> <p>4 Q. Did you attend a meeting, a diocesan</p> <p>5 meeting, in May of 2019 in the White Mountains?</p> <p>6 A. Yes, I believe I did.</p> <p>7 Q. And what was the purpose for that</p> <p>8 meeting?</p> <p>9 A. If it's the meeting that I think you're</p> <p>10 referencing, it was the priest convocation.</p> <p>11 Q. And what's that?</p> <p>12 A. It's just an annual gathering of all</p> <p>13 the priests of the diocese. There's usually a talk of</p> <p>14 some sort, you know, a speaker of some sort, and</p> <p>15 social gatherings as well. I think it's like two</p> <p>16 days, maybe three days.</p> <p>17 Q. Okay. Do you remember seeing Father</p> <p>18 de Laire there?</p> <p>19 A. Yes.</p> <p>20 Q. And did you have any interaction with</p> <p>21 him at that meeting in the White Mountains?</p> <p>22 A. I believe probably only socially.</p> <p>23 Q. Had you read the article -- any</p> <p>24 articles about de Laire in my client -- written by my</p> <p>25 client or placed on my client's website prior to that</p>	<p style="text-align: right;">Page 16</p> <p>1 mind.</p> <p>2 MR. O'CONNELL: There was feedback,</p> <p>3 Kate.</p> <p>4 MS. KLAUS: Oh, okay.</p> <p>5 Q. (BY MS. KLAUS) Are you aware of any</p> <p>6 person who believes that -- or has communicated to you</p> <p>7 that their view of Father de Laire has changed because</p> <p>8 of the articles on my client's website?</p> <p>9 A. No.</p> <p>10 Q. Okay. I don't have any further</p> <p>11 questions.</p> <p>12 MS. ELOVECKY: I -- I would like to ask</p> <p>13 a couple of follow-up questions.</p> <p>14 EXAMINATION</p> <p>15 BY MS. ELOVECKY:</p> <p>16 Q. Father Paveligo, you mentioned that you</p> <p>17 did read the article that was published by Church</p> <p>18 Militant; is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And do you recall when it was that you</p> <p>21 read the article that was published on January 17th of</p> <p>22 2019?</p> <p>23 A. No.</p> <p>24 Q. Do you recall if you read the article</p> <p>25 within a week of it being published?</p>
<p style="text-align: right;">Page 15</p> <p>1 May meeting?</p> <p>2 A. I don't recall.</p> <p>3 Q. Were you angry at Dr. -- at Father</p> <p>4 de Laire at that meeting?</p> <p>5 A. No.</p> <p>6 Q. Did you, to the best of your</p> <p>7 recollection, do anything to make him -- or to</p> <p>8 communicate to him that you were uncomfortable to be</p> <p>9 at the meeting with him?</p> <p>10 A. No.</p> <p>11 Q. Do you know why de Laire would identify</p> <p>12 you as someone who gave him an uncomfortable or angry</p> <p>13 look in a public place at that meeting?</p> <p>14 A. No.</p> <p>15 Q. Do you have any idea whatsoever why</p> <p>16 de Laire believe you snubbed him at that meeting?</p> <p>17 A. No.</p> <p>18 Q. Did your view of Father de Laire change</p> <p>19 in any way as a result of anything you saw or read on</p> <p>20 the Church Militant website?</p> <p>21 A. No.</p> <p>22 Q. Are you aware of any other person</p> <p>23 whose --</p> <p>24 MS. KLAUS: I'm sorry. Suzanne, did</p> <p>25 you have an -- I thought I heard something. Never</p>	<p style="text-align: right;">Page 17</p> <p>1 A. Probably. I would say it was probably</p> <p>2 within a week.</p> <p>3 Q. Okay. I would like to share a document</p> <p>4 on my screen. Okay. So I'm sharing what I believe is</p> <p>5 the article. Do you see that? It says "Church</p> <p>6 Militant," and then I believe I'm pointing to -- it</p> <p>7 says "NH vicar changes dogma into heresy." Do you see</p> <p>8 that?</p> <p>9 A. I do.</p> <p>10 Q. And then at the bottom right it says</p> <p>11 CM0042.</p> <p>12 A. Yep.</p> <p>13 Q. Okay. And that, just for the record,</p> <p>14 is a Bates stamp. It shows that this was produced by</p> <p>15 Church Militant at Bates stamp 42. So I'm turning to</p> <p>16 what is marked as Bates stamp CM0045, and I am looking</p> <p>17 at Paragraph -- one, two, three -- 4. It states</p> <p>18 "de Laire is said by current work colleagues to be</p> <p>19 emotionally unstable in his role as chief canonical</p> <p>20 judge of the diocese and counselor to his bishop." Do</p> <p>21 you see that?</p> <p>22 A. I do.</p> <p>23 Q. And did you read that in the article?</p> <p>24 A. I did.</p> <p>25 Q. Okay. Had you ever conveyed such a</p>